

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BSG RESOURCES (GUINEA) LIMITED, BSG
RESOURCES (GUINEA) SARL, and BSG
RESOURCES LIMITED,

Plaintiffs,

v.

GEORGE SOROS, OPEN SOCIETY
FOUNDATIONS, OPEN SOCIETY
INSTITUTE, FOUNDATION TO PROMOTE
OPEN SOCIETY, OPEN SOCIETY
FOUNDATION, INC., ALLIANCE FOR OPEN
SOCIETY INTERNATIONAL INC., OPEN
SOCIETY POLICY CENTER, and OPEN
SOCIETY FUND,

Defendants.

**NOTICE OF APPLICATION FOR THE ISSUANCE OF LETTER OF REQUEST
(LETTER ROGATORY)**

PLEASE TAKE NOTICE that upon the Application for the Issuance of a Letter of Request (Letter Rogatory) for the Production of Documents in the British Virgin Islands Pursuant to the Hague Convention submitted by Defendants George Soros, Open Society Foundations, Open Society Institute, Foundation to Promote Open Society, Open Society Foundation, Inc., Alliance for Open Society International, Inc., Open Society Policy Center, and Open Society Fund (collectively, "Defendants"), and exhibits thereto, and all other papers and proceedings herein, Defendants will move this Court, before the Honorable Judge Andrew J. Peck, at the United States Courthouse, 500 Pearl Street, New York, NY 10007, for an order issuing a Letter of Request addressed to the Registrar of the Supreme Court, for the attention of

the Supreme Court Registry, No. 84 Main Street, P.O. Box 418, Road Town, Tortola, British Virgin Islands VG1110, acting as the Central Authority of the British Virgin Islands.

Dated: October 27, 2017
New York, New York

Respectfully submitted,

WILLKIE FARR & GALLAGHER LLP

By: /s/ Elizabeth J. Bower

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